

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

<b>UNITED STATES OF AMERICA,</b>	)	
	)	
<b>Plaintiff,</b>	)	<b>Criminal No. 4:13CR540-3</b>
	)	
<b>v.</b>	)	
	)	<b>JUDGE SOLOMON OLIVER JR.</b>
<b>CAROLINE ALBA VENTURA,</b>	)	
	)	
<b>Defendant.</b>	)	

**MOTION TO ALTER THE CONDITIONS OF BOND BY TERMINATING THE  
ELECTRONIC MONITORING REQUIREMENT**

Defendant, by and through counsel, requests that her court-imposed electronic monitoring be terminated pending the resolution of this case. A condition of Ms. Alba's bond has been electronic monitoring.

Ms. Alba has been on bond, without incident, since her arrest. She does not have a criminal record and is also eligible for a safety-valve-sentencing reduction in this case. While on bond she has been employed and going to school. Her supervising pretrial services officer has suggested that further electronic monitoring is unnecessary.

As a result of her excellent behavior while on pretrial release, her work history, and her lack of a criminal history, Ms. Alba is requesting that the electronic monitoring requirement be eliminated as a condition of bond.

Respectfully submitted,

/s/Robert Duffrin

Attorney Robert Duffrin 0061784  
Attorney for Caroline Alba Ventura  
860 Boardman-Canfield Road, #204  
Youngstown, OH 44512  
(330) 454-2136  
duffrin@whalenduffrinlaw.com

**CERTIFICATE OF SERVICE**

I hereby certify that on August 11, 2014 a copy of foregoing MOTION TO ALTER THE CONDITIONS OF BOND was filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. All other parties will be served by regular U.S. mail. Parties may access this filing through the Court's system.

Respectfully submitted,

/s/Robert Duffrin

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